

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No. 1:20-cv-00954-WO-JLW

FARHAD AZIMA,

Plaintiff,

v.

NICHOLAS DEL ROSSO and  
VITAL MANAGEMENT SERVICES,  
INC.,

Defendants.

**DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT AND  
REQUEST FOR ORAL  
ARGUMENT**

**Fed. R. Civ. P. 56**

Defendants Nicholas Del Rosso and Vital Management Services, Inc. (collectively, "Defendants"), pursuant to Fed. R. Civ. P. 56(a) and Local Rules 7.3 & 56.1, hereby move the Court for summary judgment on Plaintiff's remaining claims for (1) misappropriation of trade secrets under North Carolina law and (2) contingent civil conspiracy, on the grounds that there is no genuine issue of material fact and that Defendants are entitled to judgment as a matter of law.

In support of this motion, Defendants are contemporaneously submitting a Memorandum in Support of their Motion for Summary Judgment with citations to the record evidence, discovery, and documents supporting judgment in favor of Defendants as a matter of law. That cited record material is being attached hereto as Exhibits A through P.

Pursuant to LR 7.3 (c)(1), Defendants request a hearing and oral argument on this Motion given the complexity and the breadth of information covered.

This the 15<sup>th</sup> day of July, 2024.

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*Counsel for Defendants*

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of July 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send electronic notification of filing to the following:

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